

FILED 17 NOV '22 14:09 USDC-ORE

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

UNITED STATES OF AMERICA

6:22-cr- 00410-AA

v.

INDICTMENT

BRANDON KUPER,

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2422(b)

Defendant.

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

(Sexual Exploitation and Attempted Sexual Exploitation of Children)  
(18 U.S.C. § 2251(a) and (e))

On or about November 3, 2022, in the District of Oregon and elsewhere, defendant **BRANDON KUPER** knowingly used, employed, persuaded, induced and coerced a minor, Minor Victim 1 (MV1), to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and attempted to do the same, and the visual depiction was produced using materials that had been mailed, shipped or transported in or affecting interstate or foreign commerce, and defendant knowing or having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, including by computer;

In violation of Title 18, United States Code, Section 2251(a) and (e).

Indictment

Page 1

**COUNT 2**  
**(Coercion and Enticement of a Minor)**  
**(18 U.S.C. § 2422(b))**

On or about November 3, 2022, in the District of Oregon and elsewhere, defendant **BRANDON KUPER** did use any facility or means of interstate and foreign commerce, that is a digital device connected to the internet, to knowingly persuade, induce, entice and coerce MV1, an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

**CRIMINAL FORFEITURE ALLEGATION**

Upon conviction of either of the offenses listed above, defendant **BRANDON KUPER**, shall forfeit to the United States pursuant to 18 U.S.C. §§ 2253, 2254 and 2428 any and all property used or intended to be used in any manner or part to commit or to promote the commission of said violations.

Dated: November 17, 2022

A TRUE BILL.

  
\_\_\_\_\_  
OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT  
United States Attorney

  
\_\_\_\_\_  
AMY E. POTTER  
Assistant United States Attorney